

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

CITY OF GREEN BAY, and KRIS TESKE, in
her official capacity as City of Green Bay City
Clerk,

Plaintiffs,

Civil Action No. _____

v.

MARGE BOSTELMANN, JULIE M.
GLANCEY, ANN S. JACOBS, DEAN
KNUDSON, ROBERT F. SPINDELL, JR., and
MARK L. THOMSEN, in their official capacities
as Wisconsin Elections Commissioners,
ANDREA PALM, in her official capacity as
Secretary-Designee of the Wisconsin
Department of Health Services, and
TONY EVERS, in his official capacity as
Governor of the State of Wisconsin,

Defendants.

**DECLARATION OF VANESSA R. CHAVEZ IN SUPPORT OF MOTION FOR
TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

I, Vanessa R. Chavez, am the City Attorney, counsel for the Plaintiff, City of Green Bay.

I make this declaration in support of Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction.

1. Attached as **Exhibit 1** is a true and correct copy of a March 11, 2020 University of Michigan Health Blog article titled "Flattening the Curve for COVID-19: What Does It Mean and How Can you Help?"

2. Attached as **Exhibit 2** is a true and correct copy of the Wisconsin Department of Health Services' website page titled "Outbreaks in Wisconsin," last visited March 24, 2020.

3. Attached as **Exhibit 3** is a true and correct copy of the Order for Statewide School Closure issued by the State of Wisconsin Department of Health Services signed on March 13, 2020.

4. Attached as **Exhibit 4** is a true and correct copy of the Emergency Order #5 Prohibiting Mass Gatherings of 10 People or More issued by the State of Wisconsin Department of Health Services signed on March 17, 2020.

5. Attached as **Exhibit 5** is a true and correct copy of the Emergency Order #6 Restricting the Size of Child Care Settings issued by the State of Wisconsin Department of Health Services signed on March 18, 2020.

6. Attached as **Exhibit 6** is a true and correct copy of the Emergency Order #8 Updated Mass Gathering Ban issued by the State of Wisconsin Department of Health Services signed on March 20, 2020.

7. Attached as **Exhibit 7** is a true and correct copy of the Emergency Order #12 Safer At Home Order issued by the State of Wisconsin Department of Health Services signed on March 24, 2020.

8. Attached as **Exhibit 8** is a true and correct copy of the Opinion and Order entered on March 20, 2020 by the Honorable William Conley, U.S. District Court Judge for the Western District of Wisconsin in *Democratic National Committee, et al. v. Bostelmann, et al.*, No. 20-249.

9. Attached as **Exhibit 9** is a true and correct copy of the “Update Regarding COVID-19 Election Planning” memorandum issued by the Wisconsin Elections Commission for the March 18, 2020 Commission Meeting.

10. Attached as **Exhibit 10** is a true and correct copy of the March 19, 2020 “Absentee Envelope Order Status and Delivery Details” memorandum issued by the Wisconsin Elections Commission.

11. Attached as **Exhibit 11** is a true and correct copy of pages 1, 12, 13, 14, 15, 22, 23, 73, and 74 of the City of Green Bay Election Inspector Training Manual (Updated January 2020).

12. Attached as **Exhibit 12** is a true and correct copy of the March 22, 2020 “FAQ: Hand Sanitizer Issues and Options” memorandum issued by the Wisconsin Elections Commission.

13. Attached as **Exhibit 13** is a true and correct copy of the Centers for Disease Control and Prevention website page titled “Are You at Higher Risk for Severe Illness?” last visited March 21, 2020.

14. Attached as **Exhibit 14** is a true and correct copy of the “COVID Planning – In-Person Absentee Voting Hours” memorandum issued by the Wisconsin Elections Commission for the March 18, 2020 Commission Meeting.

15. Attached as **Exhibit 15** is a true and correct copy of the letter from Debra Cronmiller, Executive Director, League of Women Voters of Wisconsin, to City of Green Bay Mayor Eric Genrich dated March 20, 2020.

16. Attached as **Exhibit 16** is a true and correct copy of the March 12, 2020 “Guidance Regarding Election Procedures and COVID-19 Public Health Emergency” memorandum issued by the Wisconsin Elections Commission.

17. Attached as **Exhibit 17** is a true and correct copy of Executive Order #72 issued by Governor Tony Evers.

18. Attached as **Exhibit 18** is a true and correct copy of a March 13, 2020 memorandum issued by the State Department of Health Services regarding “Important Recommendations for Prevention of COVID-19 in Long-Term Care Facilities and Assisted Living Facilities.”

19. Attached as **Exhibit 19** is a true and correct copy of the Wisconsin Department of Health Services website page titled “DPH Communicable Diseases Memos” last visited March 22, 2020.

20. Attached as **Exhibit 20** is a true and correct copy of a February 12, 2020 Fox6Now.com article titled “Wisconsin Elections Commission Votes Not to Send 2 Ballots to Absentee Voters.”

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury, under the laws of the United States, that the foregoing is true and correct to the best of my knowledge.

Dated this 24th day of March, 2020.

s/ Vanessa R. Chavez
Vanessa R. Chavez